

REMARKS

This Application has been carefully reviewed in light of the Final Office Action dated July 26, 2007 ("*Final Office Action*"). At the time of the *Final Office Action*, Claims 1-20 are pending, and the Examiner rejects all pending claims. Applicant respectfully requests reconsideration and favorable action in this case.

Section 102 Rejections

Claims 1-20 are rejected under 35 U.S.C. § 102(e) as anticipated by U.S. Patent Application Publication No. 2002/0122547 A1 by Hinchey et al. ("*Hinchey*"). Applicant respectfully traverses this rejection and submits that *Hinchey* does not describe, expressly or inherently, each and every limitation of the claims.

Consider Applicant's independent Claim 1, which recites:

A method for telephony call management comprising:
maintaining dial plan data comprising a plurality of route pattern definitions, each route pattern definition comprising one or more sub-strings each having an associated tag;
maintaining configured routing data comprising a configured route pattern including an expansion indicator;
accessing the configured routing data to read the configured route pattern;
identifying the expansion indicator in the configured route pattern;
accessing the dial plan data responsive to identifying the expansion indicator; and
while accessing the dial plan data, for each of the route pattern definitions in the dial plan data:
generating a route pattern based on the one or more sub-strings for the route pattern definition; and
entering the generated route pattern into a live dial database for use in routing calls placed by users.

Applicant appreciates the Examiner's consideration of and response to Applicant's previously submitted arguments. In response, Applicant more fully explains why *Hinchey* fails to disclose, at least: (1) maintaining configured routing data comprising a configured route pattern including an expansion indicator and (2) for each of the route pattern definitions, generating a route pattern and entering the generated route pattern into a live dial database, as required by Claim 1.

A. *Hinchey* fails to teach maintaining configured routing data comprising a configured route pattern including an expansion indicator.

Claim 1 requires “maintaining configured routing data comprising a configured route pattern including an expansion indicator.” *Hinchey* fails to teach these claimed aspects.

As teaching these claimed aspects, the *Final Office Action* points to *Hinchey*, paragraphs 54 and 58 and explains:

Hinchey does disclose maintaining configured routing data (e.g., routing information within the route database) comprising a configured route pattern including an expansion indicator (e.g., transformation rules).

Final Office Action, p. 5.

First, Applicant respectfully submits that the *Final Office Action* improperly relies on the same element in *Hinchey* to teach two distinct aspects of Claim 1. The *Final Office Action* appears to rely on route database 326 to teach both the claimed “routing data comprising a configured route pattern” and the claimed “generated route pattern [that is entered] into a live dial database.” *Hinchey* states that route database 326 contains routing information for endpoints. *Hinchey*, ¶ 54. Accordingly, even if one assumes, for the sake of argument, that *Hinchey*’s route database teaches the claimed “live dial database for use in routing calls placed by users,” then *Hinchey*’s route database fails to teach the claimed “configured routing data comprising a configured route pattern.”

Second, *Hinchey* fails to teach “configured routing data comprising a configured route pattern including an expansion indicator,” as required by the claim. The *Final Office Action* points to “transformation rules” to teach the claimed “expansion indicator.” *Final Office Action*, p. 5. *Hinchey* only refers to “transformation rules” once:

The dial plan schema may also comprise transformation rules for manipulating dialed digits of the called alias into a fully qualified directory number (such as an E.164 number) by removing prefix digits and access codes, and expanding abbreviated numbers with national destination, country and/or private location codes as needed.

Hinchey, ¶ 58. Applicant respectfully submits that rules for manipulating dialed digits simply fail to teach the claimed “expansion indicator.”

Moreover, even if one were to assume, for the sake of argument, that these transformation rules teach an “expansion indicator,” *Hinchey* still fails to teach, suggest, or even mention that “configured routing data compris[es] a configured route pattern including

[these transformation rules],” as would be required by Claim 1. Additionally, Claim 1 also requires “identifying the expansion indicator in the configured route pattern” and “accessing the dial plan data responsive to identifying the expansion indicator.” These claimed aspects are simply not taught by the reference.

Thus, *Hinchey* does not describe, expressly or inherently, “maintaining configured routing data comprising a configured route pattern including an expansion indicator,” as required by Claim 1. Independent Claims 7, 13, 19, and 20 include limitations that, for substantially similar reasons, are not taught by *Hinchey*. Because *Hinchey* does not disclose, expressly or inherently, every element of independent Claims 1, 7, 13, 19, and 20, Applicant respectfully requests reconsideration and allowance of Claims 1, 7, 13, 19, and 20 and their respective dependent claims.

B. *Hinchey* fails to teach, for each of the route pattern definitions, generating a route pattern and entering the generated route pattern into a live dial database.

Claim 1 also requires “while accessing the dial plan data, for each of the route pattern definitions in the dial plan data: [1] generating a route pattern based on the one or more substrings for the route pattern definition; and [2] entering the generated route pattern into a live dial database.” *Hinchey* fails to teach these claimed aspects.

As teaching these claimed aspects, the *Final Office Action* points to *Hinchey*, paragraphs 36, 55, and 60-61. *Final Office Action*, p. 3. The cited portions of *Hinchey* describe the route database 114, the network translations route database subcomponent 326, the routing policies subcomponent 320, and the route list selection subcomponent 324. *Hinchey*, ¶ 36, 55, 60-61. Even assuming, for the sake of argument, that these elements (jointly or individually) describe the claimed “live dial database for use in routing calls placed by users,” the cited portions of *Hinchey* fail to teach, or even suggest, “generating a route pattern . . . and entering the generated route pattern into [that] live dial database.” *Hinchey* vaguely notes that “[t]he aggregate network route database . . . can be generated through a computer implemented process based on individual endpoint route characteristics” (*id.* at ¶ 55); however, this fails to teach, or even suggest, the specific aspects required by Claim 1, namely “while accessing the dial plan data, for each of the route pattern definitions in the dial plan data: [1] generating a route pattern based on the one or more sub-strings for

the route pattern definition; and [2] entering the generated route pattern into a live dial database.”

Thus, *Hinchey* does not describe, expressly or inherently, “while accessing the dial plan data, for each of the route pattern definitions in the dial plan data: [1] generating a route pattern based on the one or more sub-strings for the route pattern definition; and [2] entering the generated route pattern into a live dial database,” as required by Claim 1. Independent Claims 7, 13, 19, and 20 include limitations that, for substantially similar reasons, are not taught by *Hinchey*. Because *Hinchey* does not disclose, expressly or inherently, every element of independent Claims 1, 7, 13, 19, and 20, Applicant respectfully requests reconsideration and allowance of Claims 1, 7, 13, 19, and 20 and their respective dependent claims.

CONCLUSION

Applicant has made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other reasons clearly apparent, Applicant respectfully requests full allowance of all pending Claims.

If the Examiner feels that a telephone conference or an interview would advance prosecution of this Application in any manner, the undersigned attorney for Applicant stands ready to conduct such a conference at the convenience of the Examiner.

No fees are believed to be due, however, the Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

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